



September 10, 2020

Administrator Wheeler
Assistant Administrator Dunn
Acting Director Echeverria
Acting Director Messina
Acting Deputy Director Goodis

I am writing as Chairman of the Save Our Crops Coalition and as Senior Director of Agriculture for Red Gold to request that the registration of all dicamba products for over-the-top applications into soybeans and cotton be discontinued.

These dicamba products have proven themselves to injure all sensitive crops, rural landscapes and pollinator habitats. The data from all states where these are used are consistent in reporting damage from off-target movement through both direct drift and volatility. Injury is reported to have occurred miles from the original application sites. The economic losses to innocent victims is great with no real possibilities of recovery. This is why there has already been a set aside of 400 million dollars to pay for crop damages from 2015 to 2020 in addition to the 265 million dollar verdict recently awarded to a Missouri peach farmer. It is without question the most controversial product ever to become widely used in the agriculture community pitting neighbors against neighbors and economic hardship to those affected.

In addition to the losses from crop injury, there is no residue tolerance on nearly all food crops for dicamba. Any residue that would result from an off-target movement would render the crop as tainted and would have to be destroyed. Producers of specialty crops would receive no insurance payments and producers would have to rely on the court system to recover losses and could take years even if the source was known. In our case in processing tomatoes, we would lose growers because they cannot afford the risk of a major loss of their product and we as a processor would lose our supply.

The Association of Pesticide Control Officers has strongly recommended that no registration for in-crop use be allowed. States have realized the dangers that dicamba exposes their producers to. They have been forced to request restrictions well beyond what the label currently provides. Alternative forms of weed control are now widely available so any argument of the necessity of this particular product is no longer valid.

We ask that no registration for in-crop use of dicamba in soybeans and cotton be approved for 2021.

Sincerely,

A handwritten signature in black ink that reads 'Steve Smith'.

Steve Smith
Chairman, Save Our Crops
Senior Director of Agriculture, Red Gold, Inc.